

Fill in this information to identify your case:

United States Bankruptcy Court for the:

NORTHERN DISTRICT OF TEXAS

Case number (if known) Chapter 11

☐ Check if this an amended filing

Official Form 201

Voluntary Petition for Non-Individuals Filing for Bankruptcy

06/22

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name Robert Wyatt Contracting, LLC

2. All other names debtor used in the last 8 years
Include any assumed names, trade names and doing business as names

3. Debtor's federal Employer Identification Number (EIN) 82-1413471

4. Debtor's address	Principal place of business	Mailing address, if different from principal place of business
	3575 Lone Star Circle, Suite 201 Fort Worth, TX 76177 Number, Street, City, State & ZIP Code	550 Reserve St., Ste. 190, PMB #111 Southlake, TX 76092 P.O. Box, Number, Street, City, State & ZIP Code
	Tarrant County	Location of principal assets, if different from principal place of business Number, Street, City, State & ZIP Code

5. Debtor's website (URL)

6. Type of debtor
☒ Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))
☐ Partnership (excluding LLP)
☐ Other. Specify:

Debtor **Robert Wyatt Contracting, LLC**
Name

Case number (if known)

7. Describe debtor's business A. *Check one:*

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
- ☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
- ☐ Railroad (as defined in 11 U.S.C. § 101(44))
- ☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
- ☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
- ☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
- ☒ None of the above

B. *Check all that apply*

- ☐ Tax-exempt entity (as described in 26 U.S.C. §501)
- ☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. §80a-3)
- ☐ Investment advisor (as defined in 15 U.S.C. §80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

2389**8. Under which chapter of the Bankruptcy Code is the debtor filing?**

A debtor who is a "small business debtor" must check the first sub-box. A debtor as defined in § 1182(1) who elects to proceed under subchapter V of chapter 11 (whether or not the debtor is a "small business debtor") must check the second sub-box.

Check one:

- ☐ Chapter 7
- ☐ Chapter 9

☒ Chapter 11. *Check all that apply:*

- ☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D), and its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$3,024,725. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- ☐ The debtor is a debtor as defined in 11 U.S.C. § 1182(1), its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$7,500,000, **and it chooses to proceed under Subchapter V of Chapter 11**. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return, or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- ☐ A plan is being filed with this petition.
- ☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
- ☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.
- ☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12**9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?**

If more than 2 cases, attach a separate list.

- ☒ No.
- ☐ Yes.

District	_____	When	_____	Case number	_____
District	_____	When	_____	Case number	_____

Debtor **Robert Wyatt Contracting, LLC**
Name

Case number (if known)

10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?
- ☒ No
☐ Yes.

List all cases. If more than 1, attach a separate list

Debtor Relationship
District When Case number, if known

11. Why is the case filed in this district?

Check all that apply:

- ☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☐ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?

☒ No

☐ Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.

Why does the property need immediate attention? (Check all that apply.)

☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.

What is the hazard?

☐ It needs to be physically secured or protected from the weather.

☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).

☐ Other

Where is the property?

Number, Street, City, State & ZIP Code

Is the property insured?

☐ No

☐ Yes. Insurance agency

Contact name

Phone

Statistical and administrative information

13. Debtor's estimation of available funds

Check one:

- ☒ Funds will be available for distribution to unsecured creditors.
- ☐ After any administrative expenses are paid, no funds will be available to unsecured creditors.

14. Estimated number of creditors

☐ 1-49

☒ 50-99

☐ 100-199

☐ 200-999

☐ 1,000-5,000

☐ 5001-10,000

☐ 10,001-25,000

☐ 25,001-50,000

☐ 50,001-100,000

☐ More than 100,000

15. Estimated Assets

☐ \$0 - \$50,000

☐ \$50,001 - \$100,000

☐ \$100,001 - \$500,000

☐ \$500,001 - \$1 million

☐ \$1,000,001 - \$10 million

☒ \$10,000,001 - \$50 million

☐ \$50,000,001 - \$100 million

☐ \$100,000,001 - \$500 million

☐ \$500,000,001 - \$1 billion

☐ \$1,000,000,001 - \$10 billion

☐ \$10,000,000,001 - \$50 billion

☐ More than \$50 billion

16. Estimated liabilities

☐ \$0 - \$50,000

☐ \$1,000,001 - \$10 million

☐ \$500,000,001 - \$1 billion

Debtor

Robert Wyatt Contracting, LLC

Case number (if known)

Name

- ☐ \$50,001 - \$100,000
☐ \$100,001 - \$500,000
☐ \$500,001 - \$1 million

- ☒ \$10,000,001 - \$50 million
☐ \$50,000,001 - \$100 million
☐ \$100,000,001 - \$500 million

- ☐ \$1,000,000,001 - \$10 billion
☐ \$10,000,000,001 - \$50 billion
☐ More than \$50 billion

Debtor **Robert Wyatt Contracting, LLC**
Name

Case number (if known)

Request for Relief, Declaration, and Signatures

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

**17. Declaration and signature
of authorized
representative of debtor**

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on **March 1, 2024**
MM / DD / YYYY

X /s/ Robert Pfeil
Signature of authorized representative of debtor

Title **President**

Robert Pfeil
Printed name

18. Signature of attorney

X /s/ H. Joseph Acosta
Signature of attorney for debtor

Date **March 1, 2024**
MM / DD / YYYY

H. Joseph Acosta
Printed name

Dorsey & Whitney LLP
Firm name

**200 Crescent Court
Suite 1600
Dallas, TX 75201**

Number, Street, City, State & ZIP Code

Contact phone **(214) 981-9970**

Email address **acosta.joseph@dorsey.com**

24006731 TX

Bar number and State

Fill in this information to identify the case:

Debtor name **Robert Wyatt Contracting, LLC**
 United States Bankruptcy Court for the: **NORTHERN DISTRICT OF TEXAS**
 Case number (if known): _____

☐ Check if this is an amended filing

Official Form 204

Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders

12/15

A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an insider, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
Blue Cross Blue Shield 1001 E. Lookout Drive Richardson, TX 75082	888-706-0583	Premiums				\$9,606.90
Caterpillar Credit Card P.O. Box 735838 Dallas, TX 75373	877-373-9510	Repairs				\$115,705.82
Cokinios Young 1221 Lamar Street 16th Floor Houston, TX 77010		Legal services				\$19,831.00
Fidelity Investments 131 Dearborn 6th Floor Chicago, IL 60603		Employee Benefits (Employer Matching)				\$8,516.35
Fidelity Investments 131 S. Dearborn 6th Floor Chicago, IL 60603		Employee Benefits (401k)				\$9,792.00
Flora Surveying Associates 12863 George Washington Memorial Highway Glenns, VA 23149		Services				\$14,090.00
Frontier Tank Lines, Inc. 6850 TPC Drive Suite 200 McKinney, TX 75070		Fuel				\$57,356.40
Fuelman PO Box 1239 Covington, LA 70434	800-877-0800	Fuel				\$7,229.06

Debtor **Robert Wyatt Contracting, LLC**
Name

Case number (if known)

Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services,	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
Holt Cat P.O. Box 207916 San Antonio, TX 78220	972-721-2820	Rentals/parts				\$717,807.59
IPFS Corporation P.O. Box 412086 Kansas City, MO 64141	800-247-6129	Insurance premium				\$33,840.37
JTC Heavy Haul, LLC 9611 CR 528 Burleson, TX 76028	817-229-5432	Services				\$11,650.00
KSM Exchange LLC P.O. Box 270360 Oklahoma City, OK 73137	405-495-7820	Parts				\$60,397.32
Niece Equipment LP PO Box 277 Buda, TX 78610	512-252-3808	Rental/parts				\$14,289.00
Pfeil Holding Corp. 7800 Dallas Parkway Suite 310 Plano, TX 75024		Loans				\$641,476.06
ROMCO Equipment Co. P.O. Box 736957 Dallas, TX 75373-6957	214-817-4100	Parts				\$14,697.14
Southern Tire Mart 800 Highway 989 Columbia, MS 39429	601-424-3273	Parts				\$24,367.93
Spooner Construction Services LLC 309 Byers Street #100 Euless, TX 76039	817-685-8448	Services				\$16,424.12
Stuart Hose & Pipe Company 701 Riverside Drive Fort Worth, TX 76111	817-332-5297	Parts				\$8,163.05
Texas Department of Transportation P.O. Box 149001 Austin, TX 78714		Repairs				\$129,976.21
TKO Equipment P.O. Box 153389 Irving, TX 75015	972-263-4356	Repairs				\$5,329.09

**United States Bankruptcy Court
Northern District of Texas**

In re **Robert Wyatt Contracting, LLC**

Debtor(s)

Case No.
Chapter

11

LIST OF EQUITY SECURITY HOLDERS

Following is the list of the Debtor's equity security holders which is prepared in accordance with rule 1007(a)(3) for filing in this Chapter 11 Case

Name and last known address or place of business of holder	Security Class	Number of Securities	Kind of Interest
Robert Pfeil 550 Reserve St., STE190, PMB #111 Southlake, TX 76062		100%	

DECLARATION UNDER PENALTY OF PERJURY ON BEHALF OF CORPORATION OR PARTNERSHIP

I, the **President** of the corporation named as the debtor in this case, declare under penalty of perjury that I have read the foregoing List of Equity Security Holders and that it is true and correct to the best of my information and belief.

Date **March 1, 2024**

Signature **/s/ Robert Pfeil
Robert Pfeil**

Penalty for making a false statement of concealing property: Fine of up to \$500,000 or imprisonment for up to 5 years or both.
18 U.S.C. §§ 152 and 3571.

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS

In Re:

Robert Wyatt Contracting, LLC

Debtor(s)

Case No.:

§
§
§
§
§
§
§

VERIFICATION OF MAILING LIST

The Debtor(s) certifies that the attached mailing list (*only one option may be selected per form*):

- ☒ is the first mail matrix in this case.
- ☐ adds entities not listed on previously filed mailing list(s).
- ☐ changes or corrects name(s) and address(es) on previously filed mailing list(s).
- ☐ deletes name(s) and address(es) on previously filed mailing list(s).

In accordance with N.D. TX L.B.R. 1007.2, the above named Debtor(s) hereby verifies that the attached list of creditors is true and correct.

Date: **March 1, 2024**

/s/ Robert Pfeil

Robert Pfeil/President
Signer/Title

Date: **March 1, 2024**

/s/ H. Joseph Acosta

Signature of Attorney
H. Joseph Acosta
Dorsey & Whitney LLP
200 Crescent Court
Suite 1600
Dallas, TX 75201
(214) 981-9970 Fax: (214) 853-5887

82-1413471

Debtor's Social Security/Tax ID No.

Joint Debtor's Social Security/Tax ID No.

1st Source Bank
PO Box 783
Wilmington, DE 19850-5298

Ally
P.O. Box 380902
Minneapolis, MN 55438

Ashton Dallas Residential, LLC
1800 Valley View Lane, Suite 100
Dallas, TX 75234

Balboa Capital
9987 Carver Road
Suite 110
Cincinnati, OH 45242

Blue Cross Blue Shield
1001 E. Lookout Drive
Richardson, TX 75082

BMO Bank, NA
P.O. Box 7167
Pasadena, CA 91109

Cat Finance
P.O. Box 730681
Dallas, TX 75373

Caterpillar Credit Card
P.O. Box 735838
Dallas, TX 75373

Chase Bank
P.O. Box 15298
Wilmington, DE 19850

Chrysler Credit
P.O. Box 660335
Dallas, TX 75266

Circle B Engineered Solutions
1015 Champions Drive
Suite 100
Aledo, TX 76008

Cokinos Young
1221 Lamar Street
16th Floor
Houston, TX 77010

David Pfeil
6801 Glendenn Lane
Plano, TX 75024

Dorsey & Whitney LLP
Attn: Jet Willis
200 Crescent Court
Suite 200
Dallas, TX 75201

Dorsey & Whitney LLP
c/o H. Joseph Acosta
200 Crescent Court
Suite 200
Dallas, TX 75201

Equify Financial LLC
777 Main Street
Suite 3900
Fort Worth, TX 76102

Fidelity Investments
131 S. Dearborn
6th Floor
Chicago, IL 60603

First Citizens Bank & Trust Company
10201 Centurion Parkway N.
#100
Jacksonville, FL 32256

First National Bank of Granbury
P.O. Box 400
Fort Worth, TX 76102

Flora Surveying Associates
12863 George Washington
Memorial Highway
Glenns, VA 23149

Ford Motor Credit
P.O. Box 681507
Franklin, TN 37068-1507

Frontier Tank Lines, Inc.
6850 TPC Drive
Suite 200
McKinney, TX 75070

Fuelman
PO Box 1239
Covington, LA 70434

Holt Cat
P.O. Box 207916
San Antonio, TX 78220

Home Trust
P.O. Box 2211
Cornelius, NC 28031

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

IPFS Corporation
P.O. Box 412086
Kansas City, MO 64141

J.W. Faircloth & Son
P.O. Box 789
Hillsborough, NC 27278

John Deere Financial Services
P.O. Box 6600
Johnston, IA 50131-6600

JTC Heavy Haul, LLC
9611 CR 528
Burleson, TX 76028

Komatsu Financial
P.O. Box 99303
Chicago, IL 60693

KSM Exchange LLC
P.O. Box 270360
Oklahoma City, OK 73137

LCA Bank Corporation
3150 Livernois Road
Suite 300
Troy, MI 48083

Leaf
P.O. Box 5066
Hartford, CT 06102-5066

Midland Equipment Finance
P.O. Box 24245
Seattle, WA 98124

Mindy Lefevre
12261 Madison Lane
Justin, TX 76247

Niece Equipment LP
PO Box 277
Buda, TX 78610

Office of the United States Attorney
3rd Floor, 1100 Commerce Street
Dallas, TX 75242

Office of the United States Trustee
1100 Commerce Street, Room 976
Dallas, TX 75242-1699

Pfeil Holding Corp.
7800 Dallas Parkway
Suite 310
Plano, TX 75024

Quality Equipment Finance
9830 Bauer Drive
Indianapolis, IN 46280

RDO Equipment
P.O. Box 7160
Fargo, ND 58106

Risland Mantua Point Phase 2 LLC
5600 Tennyson Parkway, Suite 230
Plano, TX 75024

Risland Proper 221 LLC
1430 Beverly Drive
Prosper, TX 75078

Robert Pfeil
550 Reserve St.
STE 190
PMB #111
Southlake, TX 76092

ROMCO Equipment Co.
P.O. Box 736957
Dallas, TX 75373-6957

Sitech-Texas
3206 South W.W. White
San Antonio, TX 78222

Southern Tire Mart
800 Highway 989
Columbia, MS 39429

Spooner Construction Services LLC
309 Byers Street
#100
Euless, TX 76039

Stuart Hose & Pipe Company
701 Riverside Drive
Fort Worth, TX 76111

Texas Attorney General's Office
Attn: Bankruptcy-Collections Division
P.O. Box 12548
Austin, TX 78711

Texas Department of Transportation
P.O. Box 149001
Austin, TX 78714

Texas Motor Speedway LLC
Attn: Arlene Berends
3575 Lone Star Circle, Suite 419
Fort Worth, TX 76177

Texas Workforce Commission
TEC Building-Bankruptcy
101 East 15th Street
Austin, TX 78778

TKO Equipment
P.O. Box 153389
Irving, TX 75015

TX Commission of Environmental Quality
P.O. Box 13087
Austin, TX 78711

Well Fargo Finance
600 South 4th Street
Minneapolis, MN 55415